

Suite 800 1919 Pennsylvania Avenue N.W. Washington, D.C. 20006-3401

James M. Smith 202.973.4288 tel 202.973.4499 fax

jamesmsmith@dwt.com

January 11, 2017

VIA ECFS

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Ex Parte

WC Docket No. 09-197

Petition of Applied Research Designs, Inc. for Streamlined Designation as a Lifeline Broadband Provider Eligible

Telecommunications Carrier

Dear Ms. Dortch:

In response to Commission staff inquiries, the following supplemental information is offered in connection with the above-referenced Petition:

AR Designs' proposed LBP service will replace its current offerings, which have been dependent on grant funding of limited and uncertain duration, with a far more robust, higherspeed broadband service offering. Among others, tenants in Oakwood Shores will no longer have accessibility to AR Designs' basic service as an included amenity; instead, Lifeline-eligible households will have the opportunity to subscribe to its newly enhanced, high speed LBP service without out-of-pocket cost, while non-Lifeline eligible households may subscribe to the same service at \$9.25 per month. Households that do not choose to subscribe to AR Designs' offerings may, of course, subscribe to another Lifeline or non-Lifeline broadband service, as applicable, but will not receive broadband service as an included amenity of their tenancy. Once LBP designation is granted and AR Designs' enhanced service is activated and its marketing campaign is finalized and launched (estimated to be within 90 days of grant), the previously included amenity will be discontinued.

As described in its LBP application, AR Designs' new Lifeline service plan will offer 300 mbps download and 150 mbps upload speed, unlimited Wi-Fi data usage, without any data cap or overage charges, and an included Wi-Fi enabled device compliant with FCC rules. This is a significant enhancement from its current basic service with download speed of up to 150 Mbps, as well as the broadband service of other incumbent providers in the locality, which are typically limited to speeds of between 6 and 25 Mbps.

Ms. Marlene H. Dortch January 11, 2017 Page 2

Please direct any questions concerning the foregoing to the undersigned counsel.

Respectfully submitted,

James M. Smith

DAVIS WRIGHT TREMAINE LLP 1919 Pennsylvania Avenue NW

Suite 800

Washington, DC 20006

(202) 973-4288

jamesmsmith@dwt.com

Counsel to Applied Research Designs, Inc.

cc (by e-mail): Christian Hoefly, Esq.